

EXHIBIT “A”

Date of Filing:
11/02/2022

ELECTRONICALLY FILED
11/2/2022 12:32 PM
55-CV-2022-900124.00
CIRCUIT COURT OF
PIKE COUNTY, ALABAMA
JAMIE NEELEY SCARBROUGH, CLERK

IN THE CIRCUIT COURT OF
PIKE COUNTY, ALABAMA

MOSES DAVENPORT,
Respondent,

vs.

CITY OF BRUNDIDGE, et. al.
Defendant.

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CV-2022-

COMPLAINT

The Petitioners, Moses Davenport, by and through the undersigned attorneys, makes the following allegations against the City of Brundidge, Defendants, Isabelle Boyd, Mayor of Brundidge, Willie Wright, city manager City of Brundidge, Byron Gaynor city council member, Marilyn Rodgers city council member, Latisher Hall Brundidge city council member, Gerald Holland Brundidge city council member:

Parties

1. Plaintiff Moses Davenport is a citizen of the State of Alabama and has been a resident of Brundidge, Al for six (6) months preceding the filing of this complaint.
2. Defendant city of Brundidge is a municipality in the City of Brundidge, Alabama.
3. Defendant Isabelle Boyd, Mayor of Brundidge is a resident of Brundidge, Pike County, Alabama.
4. Defendant Willie Wright, city manager City of Brundidge is a resident of Pike County, Alabama.
5. Defendant Byron Gaynor city council member is a resident of Brundidge, Pike County, Alabama.

6. Defendant, Marilyn Rodgers city council member is a resident of Brundidge, Pike County, Alabama.
7. Defendant Latisher Hall Brundidge city council member is a resident of Brundidge, Pike County, Alabama.
8. Defendant Gerald Holland Brundidge city council member is a resident of Brundidge, Pike County, Alabama.
9. Fictitious Defendants A through D are those individuals who provided insurance to assist in helping plaintiff Davenport represent in employment action acted under the guise of working as employees of the City of Brundidge committed intentional violations of intentional, bad faith and wrongful acts on November 2, 2020 and/or actions were done under a mistaken interpretation of law and/or unlawful violation of Ala. Code § 11-43D-15 interference with administrative service by city council members as well as a violation of Ala. Code § 11-43C-48 and other acts of bad faith by wrongfully contributed to the conspiracy and/or bad faith dismissal of Moses Davenport, whose identity(ies) is/are unable to be ascertained at this time, but will be substituted as a Defendant(s) when ascertained.
10. Pike County, Alabama is proper for jurisdiction as all acts occurred in Pike County and the named defendants are residents of Pike County, Alabama.

Facts

11. Moses Davenport was a police officer for the city of Brundidge from June 1977 until becoming promoted as Police chief for the city of Brundidge in March of 1995.

12. Plaintiff Moses Davenport was not provided any notice and/or opportunity for challenge and was terminated on November 2, 2020 by the city of Brundidge in breach of his employment contract and the policies and procedures of the city of Brundidge and in violation of the Due Process Clause of the United States and Alabama Constitution.
13. Contrary to fundamental rights of due process of law, fairness, Alabama Law and statutory authority, all intentional acts by the named defendants were conducted in bad faith, beyond their authority, caused injury and damages to the Plaintiff Moses Davenport.
14. Prior to the city council meeting on November 2, 2020 no notice had been provided to police chief Moses Davenport that his employment was terminated for cause nor notice of any intent to terminate his employment .
15. Mayor Isabella Boyd and all named defendant council members acted under a mistaken interpretation of law and/or willful unlawful violation of Ala. Code § 11-43D-15 interference with administrative service by city council members as well as a violation of Ala. Code § 11-43C-48 and other acts of bad faith by wrongfully contributed to the conspiracy and/or bad faith dismissal of Moses Davenport .
16. No authority exists for the city of Brundidge and the named city council members to terminate the employment of police chief without proper notice and/or for cause in bad faith, contrary to law, and to the detriment and injury of Moses Davenport.

17. Mayor Boyd, City Manager Willie Wright, the named city council members and Fictitious Defendants wrongfully, in bad faith, in contrast to Alabama law, did willfully violate the policies and procedures of the City of Brundidge vote to terminate the employment of Moses Davenport and have continued to wrongfully take funds of the plaintiff since November 2, 2020.
18. City Manager Willie Wright negligently, intentionally and deliberately failed to ensure all city policies and procedures as well as mandated due process were complied with.
19. Defendants Mayor Boyd, City Manager Willie Wright, and all named council members conspired to terminate Moses Davenport in bad faith and in contrast to all principals of good faith and fair dealing, acting under a mistaken interpretation of law and/or willful unlawful violation of Ala. Code § 11-43D-15 interference with administrative service by city council members as well as a willful violation of Ala. Code § 11-43C-48 .

Count One - Breach of Contract

COUNT I (BREACH OF CONTRACT/DUTY OF GOOD FAITH AND FAIR DEALING)

20. Plaintiff hereby adopts and incorporates by reference each and every previous allegation, as if fully set out herein, paragraphs 1. through 20.
21. On or about November 2, 2020 Defendant City of Brundidge and its agents breached the duty of good faith and fairdealing owed to plaintiff Davenport with regard to his contract of employment and as a result of the breach of obligations of good faith and fair dealing plaintiff was discharged from his employment without

justification, due process and/or without following termination procedures and established policies of City of Brundidge and/or without cause.

22. Defendant City of Brundidge ratified the breach of duties owed of good faith and fair dealing which proximately caused plaintiff to be discharged from his employment without justification, due process and/or without following termination procedures and established policies of Defendant City of Brundidge and/or without cause.
23. As a result of Defendant City of Brundidge's breach of employment contract, policies and procedures of the City of Brundidge the duties of good faith and fair dealing, breach of the terms of employment Plaintiff was wrongfully discharged and has lost earnings and incurred expenses and loss of employment wages.

WHEREFORE, Plaintiff demands judgment against Defendant City of Brundidge as this Court and/or a jury may deem proper and/or necessary and/or reasonable, including attorney fees, incidental, consequential and compensatory damages, punitive damages, lost earnings plus interest and costs and/or a sum which this honorable Court and jury deems reasonable.

COUNT II (CONSPIRACY)

24. Plaintiff hereby adopts and incorporates by reference each and every previous allegation, as if fully set out herein, paragraphs 1. through 23.
25. Defendants Mayor Isabella Boyd, Brundidge city manager Willie Wright, Byron Gaynor Brundidge city council member, Marilyn Rodgers Brundidge city council member, Latisher Hall Brundidge city council member, and Gerald Holland Brundidge city council member and others whose names are unable to be identified did so conspire, agree to and commit immoral acts against Plaintiff.

26. Plaintiff hereby alleges all actions of misconduct alleged against each Defendant and severally, was committed/performed while each Defendant was acting under the guise of employment and position as City employees and at all times acted outside the line and scope of their employment and without any lawful authority.
27. Defendants Boyd, Wright, Gaynor, Rodgers, Hall and Holland agreed to and committed acts of bad faith concerning Plaintiff and as a result of their actions did so intentionally interfere with Plaintiff's personal seclusion.
28. Said individuals and agents of City of Brundidge conspired to and intentionally interfered with Plaintiff's business relation and employment relation with the city of Brundidge.
29. As a result of this conspiracy to interfere with Plaintiff's contract with the City of Brundidge and conspiracy to willfully invade plaintiff's personal seclusion Plaintiff suffered and continues to suffer from the result of being wrongfully discharged on November 2, 2020.
30. Plaintiff hereby alleges all actions of misconduct alleged against each Defendant and severally, was committed/performed while each Defendant and/or each Defendant individually and/or collectively was without lawful authority from the employment with the City of Brundidge and all actions were ratified by the City of Brundidge.
31. As a proximate result of the conspiracy of Agents of the City of Brundidge to commit immoral actions acting withing the line and scope of their employment, Plaintiff Davenport has been caused to suffer being wrongfully terminated from

the City of Brundidge, had his privacy invaded and continues to be confronted concerning his termination with present and future employers, social networks, religious and political affiliations, shame, humiliation, embarrassment, and damage to reputation.

WHEREFORE, Plaintiff demands judgment against the Defendants as this Court and/or a jury may deem proper and/or necessary and/or reasonable, including attorney fees, incidental, consequential and compensatory damages, punitive damages, lost earnings plus interest and costs and/or a sum which this honorable Court and jury deems reasonable.

Count Three - 42 U.S.C.A. § 1983

32. Plaintiff adopts and incorporates paragraphs one (1) through thirty-one (31) as if fully stated herein.
33. Defendants City of Brundidge, Mayor Boyd, City Manager Wright, Council member Gaynor, Council member Rodgers, Council member Hall and Council member Holland, and other individuals whose identity is unknown have acted in bad faith and contrary to the authority allowed under their employ with the City of Brundidge and unreasonably took the property and/or employment income of plaintiffs without any notice and/or opportunity for challenge by Plaintiffs, made motion to and voted to terminate Moses Davenport as police chief of Brundidge in contrast to all law and beyond their authority, and, alternatively, in bad faith made an incorrect interpretation of law beyond their authority.
34. Such acts of Defendant City of Brundidge, Mayor Boyd, City Manager Wright, Council member Gaynor, Council member Rodgers, Council member Hall and Council member Holland, and other individuals whose identity is unknown have

proximately caused property right and privilege of being police chief of the City of Brundidge and to be employed as a police officer to be unreasonable seized in violation of the Fourth Amendment of the Constitution of the United States.

35. Plaintiffs have suffered damages and the loss and enjoyment of his right to be police chief, right to income and property in violation of the Fourth Amendment of the United States as a proximate result of the unreasonable seizure in violation of the Fourth amendment of the Constitution of the United States by City of Brundidge, Mayor Boyd, City Manager Wright, Council member Gaynor, Council member Rodgers, Council member Hall and Council member Holland and other individuals whose identity is unknown.

Wherefore, Premises Considered, Plaintiff Moses Davenport demand judgment for all damages allowed under 42 U.S.C.A. § 1983 including attorney fees and cost associated with this action.

COUNT FIVE (Invasion of Privacy)

36. Plaintiff incorporates all previous allegations in Paragraphs 1. through 35. above as though fully set forth in this Count.
37. Defendant City of Brundidge, Mayor Boyd, City Manager Wright, Council member Gaynor, Council member Rodgers, Council member Hall and Council member Holland and other individuals whose identity is unknown wrongfully intruded upon the personal seclusion of plaintiff by the extreme and outrageous behavior as described above.
38. Defendant City of Brundidge, Mayor Boyd, City Manager Wright, Council member Gaynor, Council member Rodgers, Council member Hall and Council member

Holland and other individuals whose identity is unknown was fully aware of the pain plaintiff was suffering from and all denials of accommodation of his injury were pre-textual in nature and conducted with bad faith and in effort to invade the personal seclusion of plaintiff.

44. Plaintiff has continued to suffer pain, anguish and mental anguish as a result of the extreme and outrageous actions of agents and/or employees of Defendant.
45. The actions of agents of Defendant were vexatious, willful and made with knowledge that the statements and actions would cause Moses Davenport pain and frustration, would invade his personal seclusion and/or were made to embarrass and cause extreme mental anguish.
46. Moses Davenport as a result of the willful, intentional and deliberate actions of Defendant has been caused to suffer severe pain and frustration and such actions of Defendant were committed to cause Plaintiff Davenport severe emotional distress, severe pain, anguish, frustration and emotional mental anguish.

WHEREFORE, Plaintiff demands judgment against Defendant for such sum as the jury may find to be just and fair, plus costs.

By: Moses Davenport
Moses Davenport

ACKNOWLEDGMENT

**STATE OF ALABAMA
COUNTY OF COFFEE**

Before me, a Notary Public in and for said County and State, personally appeared **Moses Davenport**, who is personally known to me, and who has executed the foregoing, and who acknowledged that the same was true and with full understanding of the effect thereof, he executed the same, voluntarily, for the purposes expressed therein.

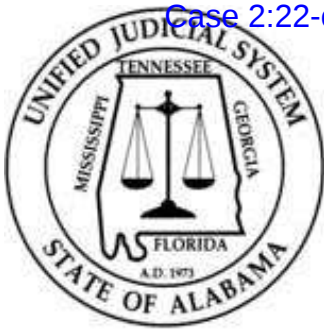
SWORN TO AND SUBSCRIBED before me this 1st day of November, 2022.

Lisa L. Jaylor
NOTARY PUBLIC

My Commission Expires: MY COMMISSION EXPIRES
OCT. 12, 2026

Griffin M. Shirley, Esq. (SHI032)
Attorney for Plaintiff Davenport
431 North Court Street
Post Office Box 408
Elba, Alabama 36323
(334) 897-5775

DEFENDANT MAY BE SERVED AT:



AlaFile E-Notice

55-CV-2022-900124.00

To: GRIFFIN MERRILL SHIRLEY
griffin@shirleylawoffice.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

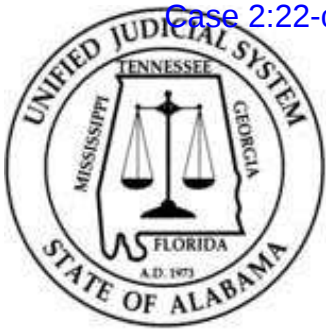
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
55-CV-2022-900124.00

The following complaint was FILED on 11/2/2022 12:32:46 PM

Notice Date: 11/2/2022 12:32:46 PM

JAMIE NEELEY SCARBROUGH
CIRCUIT COURT CLERK
PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov



AlaFile E-Notice

55-CV-2022-900124.00

To: ISABELLE BOYD
176 7TH STREET
BRUNDIDGE, AL, 36010

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
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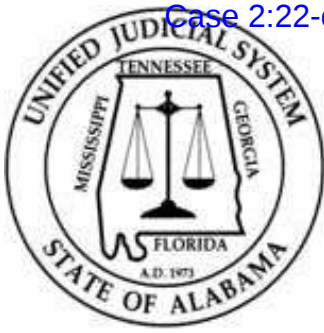
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Service by sheriff in 55 - PIKE County

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120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov



AlaFile E-Notice

55-CV-2022-900124.00

To: WILLIE WRIGHT
112 BRIAR HILL WAY
TROY, AL, 36079

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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

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jamie.scarbrough@alacourt.gov



AlaFile E-Notice

55-CV-2022-900124.00

To: BYRON GAYNOR
104 HILLCREST COURT
BRUNDIDGE, AL, 36010

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MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
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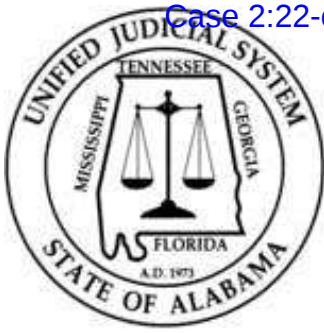
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TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov



AlaFile E-Notice

55-CV-2022-900124.00

To: MARILYN RODGERS
706 GALLOWAY ROAD
LOT # 6
BRUNDIDGE, AL, 36010

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MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
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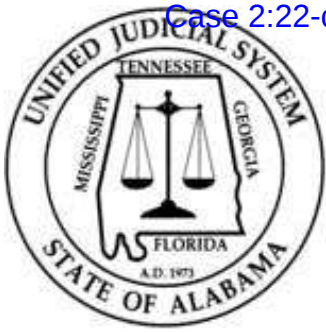
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jamie.scarbrough@alacourt.gov



AlaFile E-Notice

55-CV-2022-900124.00

To: LATISHER HALL
647 TENILLE ROAD
BRUNDIDGE, AL, 36010

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MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
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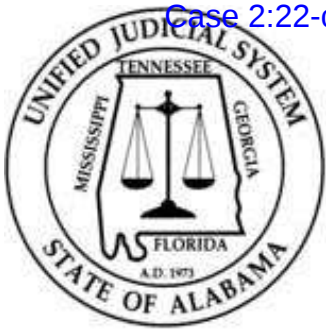
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PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov



AlaFile E-Notice

55-CV-2022-900124.00

To: GERALD HOLLAND
137 N. MAIN STREET
BRUNDIDGE, AL, 36010

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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
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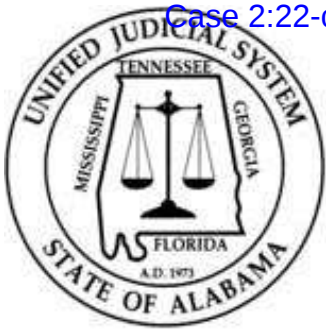
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120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov



AlaFile E-Notice

55-CV-2022-900124.00

To: CITY OF BRUNDIDGE
C/O LINDA FAUST CLERK
200 NORTH MAIN STREET
BRUNDIDGE, AL, 36010

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jamie.scarbrough@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: ISABELLE BOYD, 176 7TH STREET, BRUNDIDGE, AL 36010

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 GRIFFIN MERRILL SHIRLEY

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
 pursuant to the Alabama Rules of the Civil Procedure. (Name(s))

11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: _____
 (Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,
(Name of Person Served) (Name of County)

Alabama on _____
(Date)

 (Type of Process Server)

 (Server's Signature)

 (Address of Server)

 (Server's Printed Name)

 (Phone Number of Server)

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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: WILLIE WRIGHT, 112 BRIAR HILL WAY, TROY, AL 36079

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 GRIFFIN MERRILL SHIRLEY

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

[Address(es) of Plaintiff(s) or Attorney(s)]

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[Name(s)]

pursuant to the Alabama Rules of the Civil Procedure.

11/02/2022
(Date)

/s/ JAMIE NEELEY SCARBROUGH
(Signature of Clerk)

By: _____
(Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
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NOTICE TO: BYRON GAYNOR, 104 HILLCREST COURT, BRUNDIDGE, AL 36010

(Name and Address of Defendant)

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 GRIFFIN MERRILL SHIRLEY

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

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[Name(s)]

pursuant to the Alabama Rules of the Civil Procedure.

11/02/2022
(Date)

/s/ JAMIE NEELEY SCARBROUGH
(Signature of Clerk)

By: _____
(Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: MARILYN RODGERS, 706 GALLOWAY ROAD LOT # 6, BRUNDIDGE, AL 36010

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 GRIFFIN MERRILL SHIRLEY

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

(Address(es) of Plaintiff(s) or Attorney(s))

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11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: _____
 (Date) (Signature of Clerk) (Name)

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(Plaintiff's/Attorney's Signature)

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(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,

(Name of Person Served) (Name of County)

Alabama on _____

(Date)

 (Type of Process Server)

 (Server's Signature)

 (Address of Server)

 (Server's Printed Name)

 (Phone Number of Server)

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: LATISHER HALL, 647 TENILLE ROAD, BRUNDIDGE, AL 36010

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 GRIFFIN MERRILL SHIRLEY

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL
PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
 pursuant to the Alabama Rules of the Civil Procedure. (Name(s))

11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: _____
 (Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,
(Name of Person Served) (Name of County)

Alabama on _____
(Date)

 (Type of Process Server)

 (Server's Signature)

 (Address of Server)

 (Server's Printed Name)

 (Phone Number of Server)

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: GERALD HOLLAND, 137 N. MAIN STREET, BRUNDIDGE, AL 36010

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 GRIFFIN MERRILL SHIRLEY

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
 pursuant to the Alabama Rules of the Civil Procedure. (Name(s))

11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: _____
 (Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested. _____

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____

(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,

(Name of Person Served)

(Name of County)

 Alabama on _____

(Date)

(Type of Process Server)

(Server's Signature)

(Address of Server)

(Server's Printed Name)

(Phone Number of Server)

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: CITY OF BRUNDIDGE, C/O LINDA FAUST CLERK 200 NORTH MAIN STREET, BRUNDIDGE, AL 36010
(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 GRIFFIN MERRILL SHIRLEY
(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323
(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
(Name(s))
 pursuant to the Alabama Rules of the Civil Procedure.

11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: _____
(Date) *(Signature of Clerk)* *(Name)*

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☐ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
 _____ in _____ County,
(Name of Person Served) *(Name of County)*

Alabama on _____
(Date)

(Type of Process Server)

(Server's Signature)

(Address of Server)

(Server's Printed Name)

(Phone Number of Server)

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	<div style="text-align: right; margin-bottom: 5px;"><i>J, m, J</i></div> Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

RECEIVED

NOTICE TO: ISABELLE BOYD, 176 7TH STREET, BRUNDIDGE, AL 36010

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GRIFFIN MERRILL SHIRLEY

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____

(Name(s))

11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: *[Signature]*

(Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____

(Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to Isabelle Boyd in Pike County, Alabama on 11-7-2022

(Name of Person Served) (Name of County)

CPS [Signature] _____

(Type of Process Server) (Server's Signature) (Address of Server)

Jimmy Simmons _____

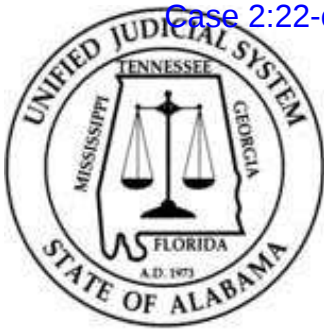
(Server's Printed Name) (Phone Number of Server)

55-CV-2022-900124.00

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

C001 - MOSES DAVENPORT	v.	D002 - ISABELLE BOYD
(Plaintiff)		(Defendant)

SERVICE RETURN COPY



AlaFile E-Notice

55-CV-2022-900124.00

Judge: JEFFERY W KELLEY

To: SHIRLEY GRIFFIN MERRILL
griffin@shirleylawoffice.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
55-CV-2022-900124.00

The following matter was served on 11/7/2022

D002 BOYD ISABELLE

Corresponding To

SERVED PERSONALLY

JAMIE NEELEY SCARBROUGH
CIRCUIT COURT CLERK
PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov

RECEIVED

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: CITY OF BRUNDIDGE, C/O LINDA FAUST CLERK 200 NORTH MAIN STREET, BRUNDIDGE, AL 36010

 (Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S),
 GRIFFIN MERRILL SHIRLEY

 (Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

 (Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
 pursuant to the Alabama Rules of the Civil Procedure. _____
 (Date) 11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: Maith
 (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested. _____
 (Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
 (Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to City of Brundidge to Linda Faust in PIKE County.
 (Name of Person Served) (Name of County)

Alabama on 11-7-2022
 (Date)

CPL _____
 (Type of Process Server)

Jimmy Simmons
 (Server's Signature)


Jimmy Simmons
 (Server's Printed Name)

 (Address of Server)

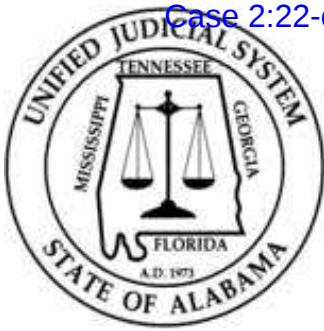
 (Phone Number of Server)

55-CV-2022-900124.00
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

C001 - MOSES DAVENPORT _____ (Plaintiff)	v.	D001 - CITY OF BRUNDIDGE _____ (Defendant)
--	----	--



SERVICE RETURN COPY



AlaFile E-Notice

55-CV-2022-900124.00

Judge: JEFFERY W KELLEY

To: SHIRLEY GRIFFIN MERRILL
griffin@shirleylawoffice.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
55-CV-2022-900124.00

The following matter was served on 11/7/2022

D001 CITY OF BRUNDIDGE
Corresponding To
SERVED PERSONALLY

JAMIE NEELEY SCARBROUGH
CIRCUIT COURT CLERK
PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

RECEIVED
 Sheriff's Dept.

NOTICE TO: WILLIE WRIGHT, 112 BRIAR HILL WAY, TROY, AL 36079

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S).
 GRIFFIN MERRILL SHIRLEY

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____

11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: James

(Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____

(Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to Willie Wright in Pike County,

(Name of Person Served) (Name of County)

Alabama on 11-7-2022

(Date)

CS Jimmy Simmon _____


(Type of Process Server) (Server's Signature) (Address of Server)

 (Server's Printed Name) (Phone Number of Server)

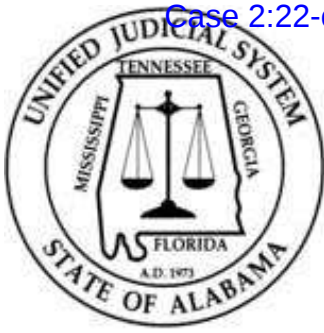
55-CV-2022-900124.00

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

C001 - MOSES DAVENPORT (Plaintiff)	v.	D003 - WILLIE WRIGHT (Defendant)
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SERVICE RETURN COPY



AlaFile E-Notice

55-CV-2022-900124.00

Judge: JEFFERY W KELLEY

To: SHIRLEY GRIFFIN MERRILL
griffin@shirleylawoffice.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
55-CV-2022-900124.00

The following matter was served on 11/7/2022

D003 WRIGHT WILLIE
Corresponding To
SERVED PERSONALLY

JAMIE NEELEY SCARBROUGH
CIRCUIT COURT CLERK
PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	Court Case Number 55-CV-2022-900124.00
--	------------------------------------	--

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

RECEIVED

NOTICE TO: BYRON GAYNOR, 104 HILLCREST COURT, BRUNDIDGE, AL 36010

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPOR ~~tant~~ ^{tant} ~~And you~~ ^{And you} MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GRIFFIN MERRILL SHIRLEY

(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323

(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____

pursuant to the Alabama Rules of the Civil Procedure.

11/02/2022
 (Date)

/s/ JAMIE NEELEY SCARBROUGH
 (Signature of Clerk)

By: *[Signature]*
 (Name)

☐ Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____

(Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____

Byron Gaynor
 (Name of Person Served)

in *Pike*
 (Name of County)

County,

Alabama on *11-9-22*

(Date)

 (Type of Process Server)

[Signature]
 (Server's Signature)

 (Address of Server)

 (Server's Printed Name)


 (Phone Number of Server)

55-CV-2022-900124.00
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

C001 - MOSES DAVENPORT
 (Plaintiff)

v.

D004 - BYRON GAYNOR
 (Defendant)



SERVICE RETURN COPY



AlaFile E-Notice

55-CV-2022-900124.00

Judge: JEFFERY W KELLEY

To: SHIRLEY GRIFFIN MERRILL
griffin@shirleylawoffice.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
55-CV-2022-900124.00

The following matter was served on 11/9/2022

D004 GAYNOR BYRON
Corresponding To
SERVED PERSONALLY

JAMIE NEELEY SCARBROUGH
CIRCUIT COURT CLERK
PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL -	<div style="text-align: center; font-size: 1.2em; margin-bottom: 5px;">TAD</div> Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

RECEIVED

NOTICE TO: GERALD HOLLAND, 137 N. MAIN STREET, BRUNDIDGE, AL 36010

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S).

 GRIFFIN MERRILL SHIRLEY
 (Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323
 (Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
 pursuant to the Alabama Rules of the Civil Procedure. (Name(s))

11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: [Signature]
 (Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested. _____
 (Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
 (Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
Gerald Holland in Pike County,
 (Name of Person Served) (Name of County)

Alabama on 11-8-22
 (Date)

 (Type of Process Server)

[Signature]
 (Server's Signature)


 (Server's Printed Name)

 (Address of Server)

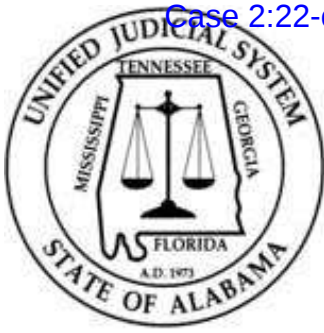
 (Phone Number of Server)

55-CV-2022-900124.00
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

C001 - MOSES DAVENPORT (Plaintiff)	v.	D007 - GERALD HOLLAND (Defendant)
---------------------------------------	----	--------------------------------------



SERVICE RETURN COPY



AlaFile E-Notice

55-CV-2022-900124.00

Judge: JEFFERY W KELLEY

To: SHIRLEY GRIFFIN MERRILL
griffin@shirleylawoffice.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
55-CV-2022-900124.00

The following matter was served on 11/9/2022

D007 HOLLAND GERALD
Corresponding To
SERVED PERSONALLY

JAMIE NEELEY SCARBROUGH
CIRCUIT COURT CLERK
PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov

RECEIVED

708

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS - CIVIL - Sheriff's Dept.	Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: LATISHER HALL, 647 TENILLE ROAD, BRUNDIDGE, AL 36010
(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), GRIFFIN MERRILL SHIRLEY
(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323
(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
(Name(s))

11/02/2022 /s/ JAMIE NEELEY SCARBROUGH By: Latisha Hall
(Date) (Signature of Clerk) (Name)

☐ Certified Mail is hereby requested. _____
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
Latisha Hall in Pike County,
(Name of Person Served) (Name of County)

Alabama on 11-9-22
(Date)

(Type of Process Server)

[Signature]
(Server's Signature)


(Server's Printed Name)

(Address of Server)

(Phone Number of Server)

55-CV-2022-900124.00
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

C001 - MOSES DAVENPORT <small>(Plaintiff)</small>	v.	D006 - LATISHER HALL <small>(Defendant)</small>
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SERVICE RETURN COPY



AlaFile E-Notice

55-CV-2022-900124.00

Judge: JEFFERY W KELLEY

To: SHIRLEY GRIFFIN MERRILL
griffin@shirleylawoffice.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
55-CV-2022-900124.00

The following matter was served on 11/9/2022

D006 HALL LATISHER
Corresponding To
SERVED PERSONALLY

JAMIE NEELEY SCARBROUGH
CIRCUIT COURT CLERK
PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov

RECEIVED

110 d

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017	SUMMONS Sheriff's Dept. - CIVIL -	Court Case Number 55-CV-2022-900124.00
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IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA
MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

NOTICE TO: MARILYN RODGERS, 706 GALLOWAY ROAD LOT # 6, BRUNDIDGE, AL 36010
(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S).
 GRIFFIN MERRILL SHIRLEY
(Name(s) of Attorney(s))

WHOSE ADDRESS(ES) IS/ARE: POST OFFICE BOX 408, ELBA, AL 36323
(Address(es) of Plaintiff(s) or Attorney(s))

THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

☒ You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.

☐ Service by certified mail of this Summons is initiated upon the written request of _____
(Name(s))

11/02/2022
(Date)
/s/ JAMIE NEELEY SCARBROUGH
(Signature of Clerk)
By [Signature]
(Name)

☐ Certified Mail is hereby requested.
(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

☐ Return receipt of certified mail received in this office on _____
(Date)

☒ I certify that I personally delivered a copy of this Summons and Complaint or other document to _____
Marilyn Rodgers in Pike County,
(Name of Person Served) (Name of County)

Alabama on 11-9-22
(Date)

(Type of Process Server)

[Signature]
(Server's Signature)


(Server's Printed Name)

(Address of Server)

(Phone Number of Server)

55-CV-2022-900124.00
 MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL

C001 - MOSES DAVENPORT <small>(Plaintiff)</small>	v.	D005 - MARILYN RODGERS <small>(Defendant)</small>
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SERVICE RETURN COPY



AlaFile E-Notice

55-CV-2022-900124.00

Judge: JEFFERY W KELLEY

To: SHIRLEY GRIFFIN MERRILL
griffin@shirleylawoffice.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF PIKE COUNTY, ALABAMA

MOSES DAVENPORT V. CITY OF BRUNDIDGE ET AL
55-CV-2022-900124.00

The following matter was served on 11/9/2022

D005 RODGERS MARILYN
Corresponding To
SERVED PERSONALLY

JAMIE NEELEY SCARBROUGH
CIRCUIT COURT CLERK
PIKE COUNTY, ALABAMA
120 WEST CHURCH STREET
TROY, AL, 36081

334-566-4622
jamie.scarbrough@alacourt.gov